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November 1, 2013

VIA ECF ONLY

Hon. Carla E. Craig
Chief United States Bankruptcy Judge
United States Bankruptcy Court
271 Cadman Plaza East
Brooklyn, New York 11201

Re: Interfaith Medical Center, Inc
Case No. 12-48226-cec

Dear Judge Craig,

Please be advised that the undersigned, as counsel for the New York State Nurses' Association ("NYSNA"), together with the Public Advocate and Local 1199SEIU United Healthcare Workers East and Mr. Simpson representing the IM Foundation, Inc., respectfully request approximately a one week adjournment of the debtor's motion to implement a Plan of Closure. As the Court is no doubt aware, at approximately noon today, debtor's counsel filed a fourth supplement to the motion consisting of the Amended Closure Plan which was filed with the Department of Health on October 28, 2013. Despite the fact that the Closure Plan was filed five days ago, the debtor did not give notice of it, nor provide copies of it to any of the parties-in-interest until the Friday afternoon before the Monday morning hearing. The Closure Plan, from a very quick survey, still raises substantial issues as to what is going to happen to the patients that are presently in the hospital (it is my understanding that the hospital is at or above ninety-five percent capacity) and has given parties an inadequate opportunity to prepare for an evidentiary hearing.

I e-mailed Mr. Lipkin this morning requesting a response on the adjournment request. Instead of receiving a response, a little while ago the Agenda was posted which indicated that these matters are going forward.

I look forward to the Court's response.

Thank you.

Very truly yours,

s/Avrum J. Rosen
Avrum J. Rosen

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